

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

\_\_\_\_\_  
**IN RE MBNA CORP. ERISA LITIGATION**  
\_\_\_\_\_

)  
) **Master Docket No. 05-429 (GMS)**  
)  
)

**[PROPOSED] SCHEDULING ORDER DEADLINES**

**WHEREAS** the parties have reached an agreement in principle to settle this matter;

**WHEREAS** the parties agreed to notify the Court by July 21, 2008, of the date by when the proposed settlement would be filed;

**WHEREAS** to provide Defendants with sufficient time to undertake the internal steps that are necessary to properly prepare settlement papers, Defendants are requesting that the proposed settlement papers be filed with the Court on or before September 19, 2008:

**IT IS HEREBY STIPULATED AND AGREED,** by and between the undersigned counsel for the parties herein, subject to the Order of this Court, the proposed settlement papers shall be submitted to the Court on or before September 19, 2008.

DATED: July 21, 2008

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*Attorneys for Plaintiffs*

SO ORDERED, this \_\_\_\_ day of \_\_\_\_, 2008

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Chief United States District Judge